

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHRISTINA LESLIE, individually and on :  
behalf of all others similarly situated, : CASE NO. 1:22-CV-07936-JMF  
:  
Plaintiff, :  
:  
-against- :  
:  
THOMSON REUTERS CORPORATION, :  
:  
Defendant. :  
:  
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**NOTICE OF CONSTITUTIONAL QUESTION**

To: Merrick B. Garland  
Attorney General for the United States  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

**PLEASE TAKE NOTICE**, pursuant to Fed. R. Civ. P. 5.1(a)(1)(B), that Defendant Reuters News & Media, Inc., sued herein as Thomson Reuters Corporation’s (collectively with its affiliates, “Reuters”) Motion to Dismiss Plaintiff’s Complaint questions the constitutionality of the federal Video Privacy Protection Act, 18 U.S.C. § 2710. Specifically, Reuters argues that the VPPA is an unconstitutional restraint on speech in violation of the First Amendment of the United States Constitution. A copy of Reuters’ Motion to Dismiss and Memorandum of Law in Support of Its Motion are attached hereto, and service has been made upon the United States Attorney General.

Dated: January 18, 2023

Respectfully submitted,

**BAKER & HOSTETLER LLP**

/s/ Bonnie Keane DelGobbo

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*Attorneys for Reuters News & Media Inc.,  
sued herein as Thomson Reuters Corporation*

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that she filed and served the foregoing document via the Court's CM/ECF system, which will send notice of the filing to all counsel of record. Parties may access the filing through the Court's CM/ECF system. Parties and interested persons may access this filing through the Court's system. A copy of the foregoing and Defendant's Motion to Dismiss will also be sent by certified mail to:

Merrick B. Garland  
Attorney General for the United States  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

/s/ Bonnie Keane DelGobbo